

September 24, 2025

Dr. Michael Watson
Acting Administrator
Animal and Plant Health Inspection Service
1400 Independence Avenue SW
Washington, D.C. 20520

Dear Dr. Watson,

The National Customs Brokers and Forwarders Association of America (NCBFAA) is concerned about the impact of a potential government shutdown on import/export trade processing – an important feature of President Trump’s America First Trade policy and an important function of your agency. NCBFAA represents customs brokers and freight forwarders, who are on the frontlines of import and export trade interacting with Customs and Border Protection (CBP), the Animal and Plant Health Inspection Service (APHIS) and the many other Partner Government Agencies that safeguard our nation.

Safe and healthy trade supply chains are necessary to both the economic and physical security of our country and for American agriculture. In the event of a government shutdown, we ask APHIS to prioritize import and export processing in designating “excepted” or “essential” employee status. This will help to ensure that products harmful to our nation’s agriculture are kept out of the U.S. At the same time, domestic agricultural producers rely on efficient import and export supply chains to maintain productivity and to meet worldwide demand for their products.

That is why we need APHIS to designate enough “excepted” employees to ensure that import and export trade processing continues in the event of a prolonged government shutdown. More specifically, we hope APHIS will:

- **Frontline and Support Staff:** We are aware that Plant Inspection Station inspectors are user-fee funded and will continue to operate during a shutdown, as will CBP Agricultural inspectors, who will be considered “excepted” employees. Frontline staff at the ports are indeed critical. But just as important are staff in regional offices and headquarters to conduct document reviews, backstop automated systems and processes, and respond to issues relating to agriculture holds. In previous shutdowns, we saw many local issues, such as one port that was requiring any shipment with an agriculture hold to be re-exported. These problems at both headquarters and local ports created congestion at the ports, costly demurrage for the trade and inefficiencies in sorting through compliant versus noncompliant shipments. We urge you to provide sufficient staff to support critical import and export processing functions.
- **Agency Contacts:** Provide points of contact for U.S. importers, exporters and customs brokers during a government shutdown.

- **Website:** Agency websites have become a necessary lifeline for the business and trade community. Not only does it provide valuable resources and automated compliance tools, agency websites allow the trade to apply for permits and conduct other essential business. In today's automated world, staff should be available to keep the website up and running.
- **CBP War Room Presence:** During the 2018/2019 shutdown, CBP stood up a "war room" to monitor and resolve problems and maintain communication. We expect CBP will again stand up a "war room." We ask APHIS to be present in the war room. This is important for a coordinated and effective government effort to meet the trade processing challenges of a shutdown.
- **CBP Trade Calls:** CBP also conducted regular calls with business and trade to report on developments as they occur and to learn of trouble spots from the private sector. We urge APHIS participation in these calls and a willingness to troubleshoot problems.
- **Outreach to Trade:** Rapid communication with the trade during a shutdown is essential. As a reminder, NCBFAA can reach thousands of customs brokers/forwarders within minutes to provide guidance or other useful information that will in turn be spread to hundreds of thousands of U.S. importers/exporters. Please utilize NCBFAA as a resource to spread the word, as necessary.

We hope that a government shutdown can be averted. In the meantime, NCBFAA stands ready to work with APHIS if a government shutdown does occur. Please let us know how we can best help you.

Sincerely,



Jose D. Gonzalez
President